CLOSURE
PLAN

FOR

ALLIED CORPORATION
DANVILLE WORKS

EPA FACILITY I. D. NO. ILD005463344

APPROVED: R L Purgason
R. L. PURGASON
PLANT MANAGER

PREPARED BY: G M Kady
G. M. KADY
SUPERVISOR SAFETY/
POLLUTION CONTROL

Original Issue: 2/81
Revised: 3/85

CONTENTS

PURPOSE

To close Danville Work's hazardous waste facility in a manner that minimizes the need for further maintenance, and controls minimizes or eliminates, to the extent necessary to protect human health and the environment, post closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the groundwater, or surface waters or to the atmosphere.

GENERAL FACILITY INFORMATION

Danville Works manufactures and packages refrigerant and dispersant gases. As a result of this process, a byproduct hydrochloric acid is generated. Most of this acid is sold as food grade acid, however, any surplus or off-spec acid is collected and disposed of in an onsite deepwell. This deepwell is also used for disposal of plant pollution control scrubber acids, boiler and cooling tower blowdowns and contaminated runoff. In addition to these waste streams, the plant operation generates small quantities of hazardous wastes which are kept in 55 gallon drums and placed in a specified drum storage area. This drum storage area is subject to closure under RCRA.

HAZARDOUS WASTE AREAS

I. Drum Storage Area

The drum storage area is located north of #40 storage tank. The storage pad is constructed of reinforced concrete. It measures 25' x 25' and is surrounded by a six inch curb. The area is under roof to provide protection from adverse weather. Storage capacity is 400 55 gallon drums. Design life of the pad and roof is 20 years.

Waste which may be stored in this area include ignitable wastes (D001), corrosive wastes (D002), contaminated carbon tetrachloride (U211), neutralized antimony catalyst washings (K021), spent solvents (F001) and contaminated methylene chloride (U080) and arsenic contaminated wastes (D004).

II. Waste Storage Tanks

There are three above ground tanks designated for waste storage. They include two adjacent tanks, #33 and #34, which are located in the center of the HCl tank farm, and #40 tank located at the east end of the plant.

Tanks #33 and #34 are identical in size. They have a diameter of 12' and a height of 25' giving them a capacity of 20,000 gallons each. Tank #34 is made of steel and has a rubber lining. Tank #33 is made of fiberglass. Both tanks have a design life of 20 years. These tanks are used to store dilute off-spec or waste hydrochloric acid (D002) along with dilute sodium hydroxide (D002) and sulfuric acid (D002). The residence time of any single tankful of this waste is less than 90 days.

Tank #40 is also a rubber lined steel tank and has a capacity of 420,000 gallons. It is 40' high and has a diameter of 43 1/2'. Design life of this rubber lining is also 20 years. This tank is primarily used as a backup for #33 and #34 tanks. If used for storage, this tank would be emptied within a 90 day period.

DRUM STORAGE
CLOSURE

The drum storage area will be closed by transporting the hazardous wastes to offsite facilities for disposal using the hazardous waste manifest system.

The drummed waste expected to be in storage immediately prior to closure will be disposed of as follows:

WASTE STREAM/QTY	DISPOSAL SITE/TYPE
Arsenic contaminated waste/25 drums	CECOS International Williamsburg,OH./landfill
Arsenic contaminated, low pH wastes/55 drums	CECOS International Livingston, LA./landfill
Waste carbon tetrachloride/7 drums	Liquid Waste Disposal Calvert City, KY./incinerator
Waste degreasing solvents/1 drum	Liquid Waste Disposal Calvert City, KY./incinerator
Ignitable waste, liquid/2 drums	Liquid Waste Disposal Calvert City, KY./incinerator
Ignitable Waste, solid/25 drums	CECOS International Williamsburg,OH./landfill

Although it is unlikely there will be any hazardous waste residues on the drum storage pad at the time of closure, the pad will be inspected for such residues. If found, the solid waste (activated alumina pellets, paper paint filters, polypropylene deep well filters etc.) will be swept up and containerized and shipped to the appropriate above listed disposal site. Due to the vapor pressure of the liquids stored (carbon tetrachloride, degreasing solvents) any minor spills would readily volatize into the atmosphere. Any moderate spills would be siphoned into a drum or absorbed with sawdust, containerized and disposed at LWD, Calvert City, Kentucky. Due to the integrity of the concrerte storage pad and the hazardous waste stored, the above described methods will adequately decontaminate the drum storage pad of any spilled material.

An independent registered professional engineer will be brought in to witness the closure.

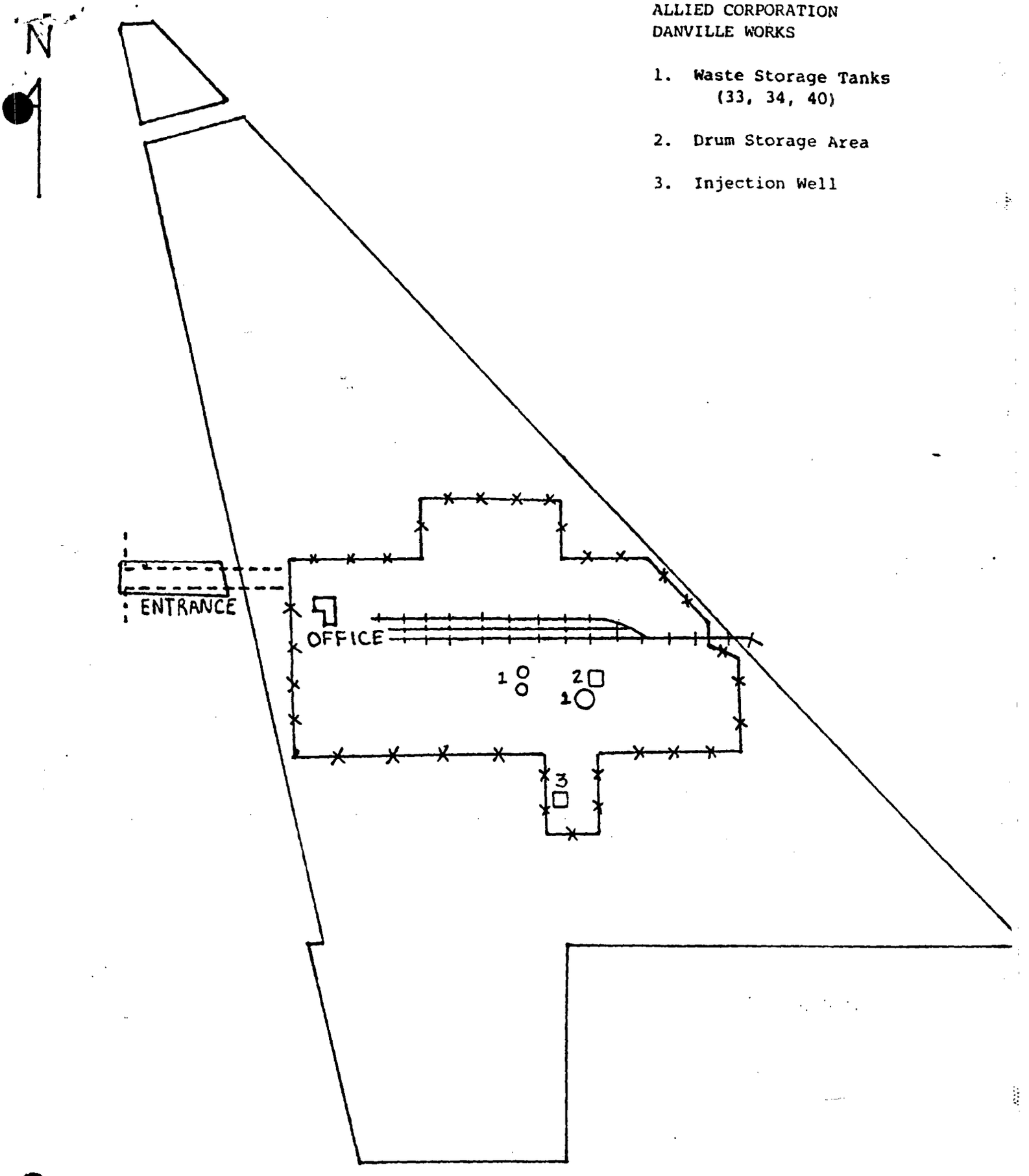
Certifications by Allied Corporation and the independent registered professional engineer of proper closure, as specified by this plan, will be submitted.

CLOSURE COSTS

	1984 ADJUSTED RATE
Transportation of drums	$ 2000.00
Disposal fee of waste	$10000.00
Certification	$ 300.00
TOTAL	$12300.00

SCHEDULE OF CLOSURE

Estimated year of closure	1985
Submit Closure Plan to IEPA	1-15-85
Final date waste will be added to storage (for ≥90 day storage)	7-30-85
Date all preprocessing completed	7-30-85
Date all inventory disposed	7-30-85
Final date closure completed	7-30-85
Total time to close facility	6 Months



ALLIED CORPORATION
DANVILLE WORKS

1. Waste Storage Tanks (33, 34, 40)
2. Drum Storage Area
3. Injection Well

APPROX. SCALE 1/4" = 100'

ALLIED

RESPONSE TO 4/17/85 CIL.

Allied Corporation
P.O. Box 13
Danville, IL 61832
Telephone (217) 446-4700

May 1, 1985

Mark A. Haney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Divsion of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

SUBJECT: COMPLIANCE INQUIRY LETTER, 4/17/85

Dear Mr. Haney:

Per the subject letter we contacted Andy Vollmer of your office for the specific direction needed to address your noted discrepancies. At Mr. Vollmer's suggestion, we are providing a description of the intended decontamination procedure for our hazardous waste storage tanks and the estimated costs of decontaminating these tanks and our hazardous waste drum storage area.

As our closure plan indicates, we have three hazardous waste storage tanks (#33, #34, #40). These tanks are used for holding our plant generated waste water prior to disposal via an on-site deep well. Decontamination per section 725.214 will be accomplished by simply flushing or purging these tanks and the associated transfer lines with city water until analyses prove all hazardous waste has been displaced into the deep well. Since the equipment needed to accomplish this task is kept on-hand, the decontamination cost will be minimal. This cost is estimated at $1,000.

As for the decontamination costs for our hazardous waste drum storage area as outlined in our closure plan, the cost is estimated at $150.

Even with the addition of these decontamination costs, the total closure cost is still considerably less than the amount ($140,300) for which we have previously demonstrated financial assurance. The higher cost estimated in our original closure plant included the closure costs for our deep well. However, the deep well closure costs are now addressed separately under the Illinois Underground Injection Control Program. Based on discussions with Mr. Vollmer, since our current RCRA closure costs are less than the amount for which we have already demonstrated financial assurance, it is our understanding we are not required to modify our current financial assurance documentation.

As you know, our closure plan, which you have cited to be in violation of IEPA regulations, had already been approved by the IEPA Division of Land Pollution Control, Permit Section. Since this plan satisfies the necessary requirements for closing our drum storage area, we will incorporate these decontamination costs into a revised closure plan within sixty days of closing our drum storage area. Again this intended action is as suggested by Mr. Vollmer.

RESPONSE TO 4/17/85 CIL.

I trust this information will satisfy your inquiry. However, please contact George Kady of my staff if you have any questions.

Sincerely,

Marion J. Foley
for Richard L. Purgason

M. J. Foley for
Richard L. Purgason
Plant Manager

MJF:cmm

Allied Chemical

P.O. Box 13
Danville, Illinois 61832
(217) 446-4700

January 17, 1985

Rama K. Chaturvedi, P. E.
Manager, RCRA Unit
Permit Section
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

SUBJECT: CLOSURE PLAN
ALLIED CORPORATION
EPA ID ILD005463344 G, TSD, UIC, PA-9

Dear Mr. Chaturvedi:

Per your phone conversation with George Kady on November 30, 1984 regarding the RCRA reclassification of Danville Works, enclosed is a Closure Plan of our facility for your approval.

As you know, with the State of Illinois having its UIC Program approved by US EPA, our disposal well is no longer regulated under RCRA. By making a few internal administrative changes to ensure we do not store hazardous waste ≥90 days, our facility will not require a RCRA permit for continued operation.

On October 3rd, we submitted a request for withdrawal of our RCRA Part A permit application to EPA Region V. Per their response we are required to submit a Closure Plan to IEPA. Copies of these letters are attached for your review. Please note that even though we will close our containerized storage area for reclassification purposes, we will again use it on a less than 90 days storage basis. Per your above noted conversation, it is our understanding we will not be required to formally close our waste storage tanks since we can demonstrate that based on the nature of our operation the residence time of any single tank of waste material is less than 90 days.

Once closure is completed, containerized hazardous waste will be shipped off site to approved disposal facilities on a less than 90 day basis. Plant procedures require all drums of hazardous waste to be placed in the drum storage area. An inspection and inventory of the drummed waste is conducted once per week by plant operators. Records of this inspection and inventory are reviewed and kept by the Safety and Pollution Control Supervisor. This Supervisor will schedule all waste shipments to ensure no hazardous waste will be stored at Danville Works for more than 90 days.

We believe this submission completes the information needed for withdrawal by our Part A Permit Application. However, if you have any questions, please contact George Kady of my staff.

Your prompt response would be appreciated.

Sincerely,

Richard L. Purgason
Plant Manager

RLP:GMK:cmm

cc: Karl J. Klepitsch, Jr., Chief
Waste Management Branch
U. S. Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, Illinois 60604

CONTENTS

PURPOSE

To close Danville Works' hazardous waste facility in a manner that minimizes the need for further maintenance, and controls minimizes or eliminates, to the extent necessary to protect human health and the environment, post closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the groundwater, or surface waters or to the atmosphere.

GENERAL FACILITY INFORMATION

Danville Works manufactures and packages refrigerant and dispersant gases. As a result of this process, a byproduct hydrochloric acid is generated. Most of this acid is sold as food grade acid, however, any surplus or off-spec acid is collected and disposed of in an onsite deepwell. This deepwell is also used for disposal of plant pollution control scrubber acids, boiler and cooling tower blowdowns and contaminated runoff. The deepwell, its associated storage tanks, and the drum storage area, which is sometimes used to store small quantities of various hazardous wastes is subject to Closure and Post Closure under RCRA.

HAZARDOUS WASTE
AREAS

I. Drum Storage Area

The drum storage area is located north of #40 storage tank. The storage pad is constructed of reinforced concrete. It measures 25' x 25' and is surrounded by a six inch curb. The east side of the curbing is sloped to allow access of forktrucks. The area is under roof to provide protection from adverse weather. Storage capacity is 400 55 gallon drums. Design life of the pad and roof is 20 years.

Waste which may be stored in this area include ignitable wastes (D001), contaminated carbon tetrachloride (U211), neutralized antimony catalyst washings (K021), spent solvents (F001) and contaminated methylene chloride (U080).

II. Waste Storage Tanks

There are three above ground tanks designated for waste storage. They include two adjacent tanks, #33 and #34, which are located in the center of the HCl tank farm, and #40 tank located at the east end of the plant.

Tanks #33 and #34 are identical in size. They have a diameter of 12' and a height of 25' giving them a capacity of 21,000 gallons each. They are made of steel and have a rubber lining which has a design life of 20 years. These tanks are used to store dilute off-spec or waste hydrochloric acid (D002) along with dilute sodium hydroxide (D002) and sulfuric acid (D002).

Tank #40 is also a rubber lined steel tank and has a capacity of 420,000 gallons. It is 40' high and has a diameter of 43 1/2'. Design life of this rubber lining is also 20 years. This tank is primarily used as a backup for #33 and #34 tanks. Although it is capable of handling the hazardous wastes stored in those tanks, it is used for storage of possible contaminated runoff which is collected in the waste sewer collection sump during periods of high rains.

III. Deepwell

The deepwell is located at the southeast corner of the plant. This is a Class I well with a depth of 3,642'. The 2 7/8" injection tube is made of fiberglass. The annular space between the injection tube and the surrounding 5 1/2" casing is filled with oil. This oil pressure is monitored so that any leaks in the injection tube would be detected. Our operating permit limits the injection rate to 150 gpm and the injection pressure to 100 psi. Periodic integrity tests of the deepwell are performed to ensure environmentally safe operation. Design life is in excess of 20 years.

The deepwell is used for disposal of normal plant process wastes which includes dilute sodium hydroxide (D002), contaminated carbon tetrachloride (U211) and dilute sulfuric and hydrochloric acids (D002).

DRUM STORAGE
CLOSURE

The drum storage area will be closed by transporting the hazardous wastes, to offsite facilities for disposal using the hazardous waste manifest system.

The drummed waste expected to be in storage immediately prior to closure will be disposed of as follows:

WASTE STREAM/QTY	DISPOSAL SITE/TYPE
Arsenic contaminated waste/25 drums	CECOS International Williamsburg,OH./landfill
Arsenic contaminated, low pH wastes/55 drums	CECOS International Livingston, LA./landfill
Waste carbon tetrachloride/7 drums	Liquid Waste Disposal Calvert City, KY./incinerator
Waste degreasing solvents/1 drum	Liquid Waste Disposal Calvert City, KY./incinerator
Ignitable waste, liquid/2 drums	Liquid Waste Disposal Calvert City, KY./incinerator
Ignitable Waste, solid/25 drums	CECOS International Williamsburg,OH./landfill

The drum storage pad will be inspected for hazardous waste residues. If present, the residue will be containerized and shipped to the above appropriate disposal site for disposal.

An independent registered professional engineer will be brought in to witness the closure.

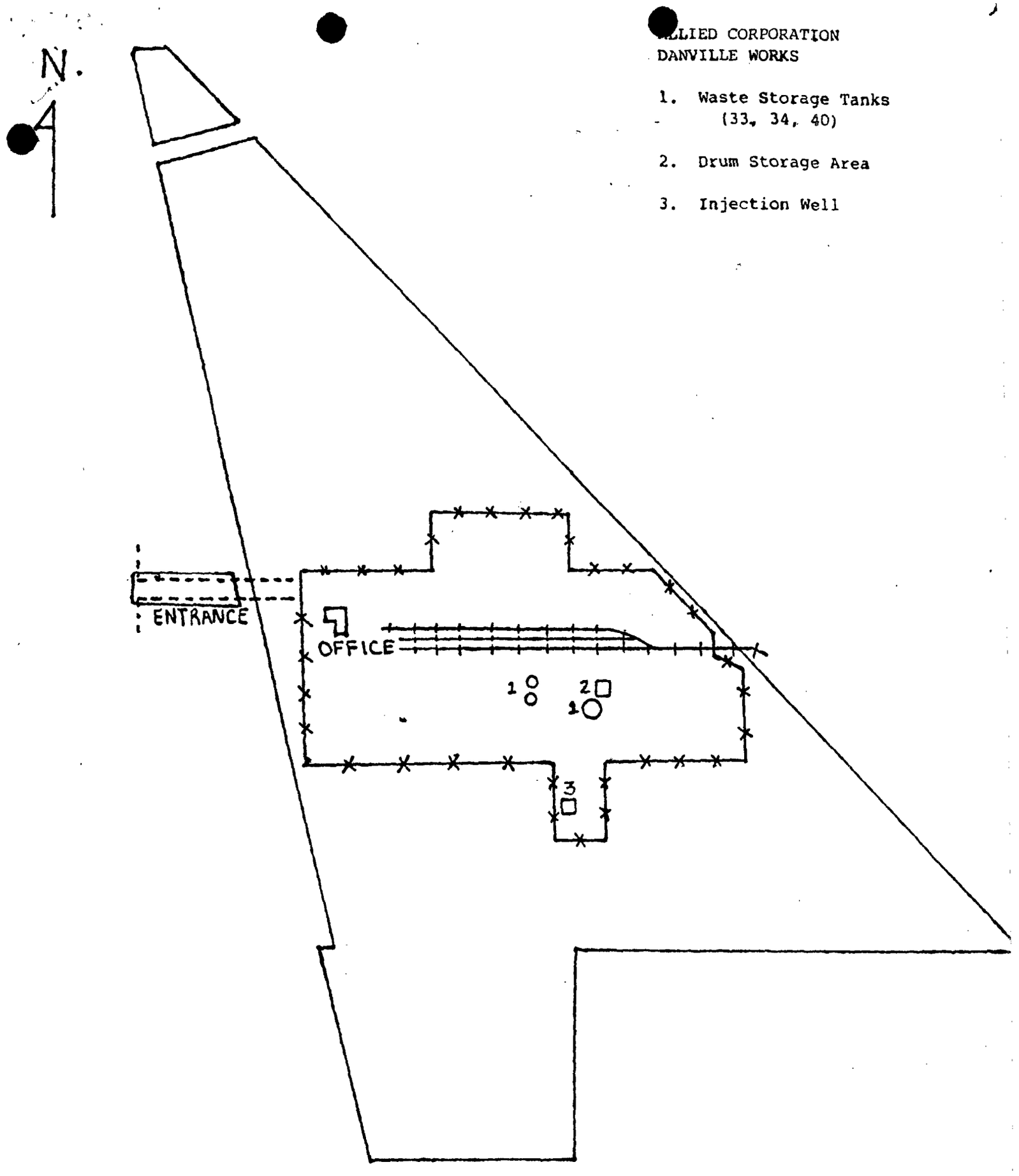
Certifications by Allied Corporation and the independent registered professional engineer of proper closure, as specified by this plan, will be submitted.

CLOSURE COSTS

	1984 ADJUSTED RATE
Transportation of drums	$ 2000.00
Disposal fee of waste	$10000.00
Certification	$ 300.00
TOTAL	$12300.00

SCHEDULE OF CLOSURE

Estimated year of closure	1985
Submit Closure Plan to IEPA	1-15-85
Final date waste will be added to storage (for ≥90 day storage)	4-1-85
Date all preprocessing completed	4-1-85
Date all inventory disposed	4-1-85
Final date closure completed	4-1-85
Total time to close facility	3 Months



ALLIED CORPORATION
DANVILLE WORKS

1. Waste Storage Tanks (33, 34, 40)
2. Drum Storage Area
3. Injection Well

APPROX. SCALE 1/4" = 100'

Attachment

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HW-12

DEC 10 1984

Richard L. Purgason, Plant Manager
Allied Chemical
P.O. Box 13
Danville, Illinois 61832

Re: Withdrawal of Part A
Permit Application
ILD 005463344

Dear Mr. Purgason:

The U.S. Environmental Protection Agency has reviewed your request to withdraw your RCRA Part A permit appliction. On the basis of the information you provided, we determined that your operation included treatment, storage, or disposal of hazardous waste subject to 35 Ill. Adm. Code Part 725. Therefore, a closure plan must be submitted directly to Permit Section, Division of Land Pollution Control, Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706. Requirements for closure are found at 35 Ill. Adm. Code Part 725. Questions on closure should be directed to Illinois EPA at the above address.

Thank you for your cooperation in this matter.

Sincerely,

Robert L. Stone

Robert L. Stone
State Implementation Officer

cc: Larry Eastep, IEPA
Bill Radlinski, IEPA

Attachment

Allied Chemical

P.O. Box 13
Danville, Illinois 61832
(217) 446-4700

October 3, 1984

EPA REGION V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

SUBJECT: RCRA Permit Application
Allied Chemical, Danville Works
EPA I.D. #ILD005463344

Dear Sir:

The Danville Works plant produces fluorocarbon refrigerants 12 & 11 and a by-product, hydrochloric acid. It currently operates under RCRA interim status since we generate, store and dispose, via an on-site deep well, of hazardous waste. Recent administrative changes both within the Illinois Environmental Protection Agency (IEPA) and the plant will enable us to legally operate without a RCRA permit or interim status.

On February 1, 1984, the Illinois UIC Program was approved by the U.S. EPA. Our deep well, which is used exclusively to dispose of waste water that is generated on-site, is permitted by the Illinois UIC program. Therefore per Subpart A, Section 265.1 (c) of the Hazardous Waste and Consolidated Permit Regulations, our disposal operation is exempted from RCRA permitting.

With that, if we accumulate our hazardous waste on-site according to the specified regulations for 90 days or less, our entire operation will not require a RCRA permit or interim status. Our original Part A permit application which was submitted on November 14, 1980, described our hazardous waste storage facilities. Those facilities included a drum storage area, a waste tank trailer, a waste collection sump and four waste storage tanks. Since that time #38 waste storage tank was taken out of service.

We are currently making arrangements with CECOS International to transport and dispose of wastes which may be stored in drums or in the waste tank trailer on a less than 90 day basis, negating the need for a RCRA permit for these facilities.

Two of our three remaining waste storage tanks (#33 & 34) and the waste collection sump contain waste on a continuous basis. These tanks are normally receiving and discharging waste continuously, preventing the residence time of any single tankful of waste material from reaching a 90 day period. These tanks are used in the following manner:

EXHIBIT A

"I certify under penalty of law that that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations".

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

1	F	I	L	D	0	0	5	4	6	3	3	4	4	1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[ ] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C 8

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[X] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. **PROCESS DESIGN CAPACITY** – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

RECEIVED
OCT 29 1985
EPA/HQ

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

1	C	D	U	P								T/A	C	1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
	D79	216,000	U	

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the apporopriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W I L D 0 0 5 4 6 3 3 4 4 — T/A: 1 — C	W DUP — T/A: 2 — C DUP

D. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D002	157,500	T	D79	
2	D004				included with above
3	K021				included with above
4					
5					
6					
7					
8					
9		NOTE: This list does not include the wastes which			
10		are or may be stored in the less than 90 day			
11		drum storage facility.			
12					
13					
14					
15					
16					
17					
18					
19					
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CONTINUE ON REVERSE

ntinued from the front.

V. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F	I	I	D	0	0	5	4	6	3	3	4	4		6
													Y/N	C
													13	15

VI. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
4 0 0 7 4 0 N	0 8 7 3 3 2 7 W
15 16 17 18 19 20 21 22	23 24 25 26 27 28 29 30

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	C G		

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (See Exhibit A)

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Richard L. Purgason	RL Purgason	October 28, 1985

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

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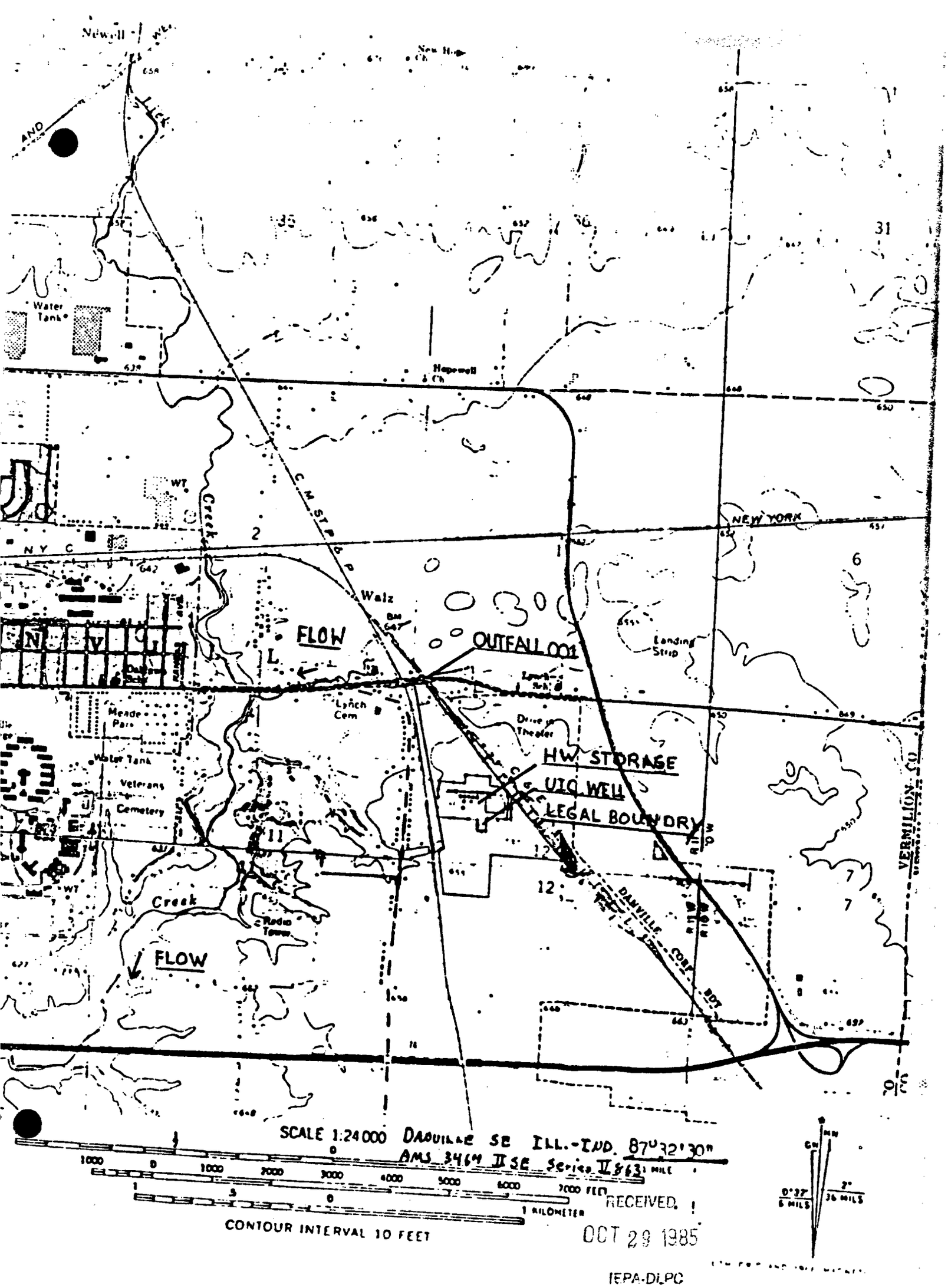

Continued from page 4.

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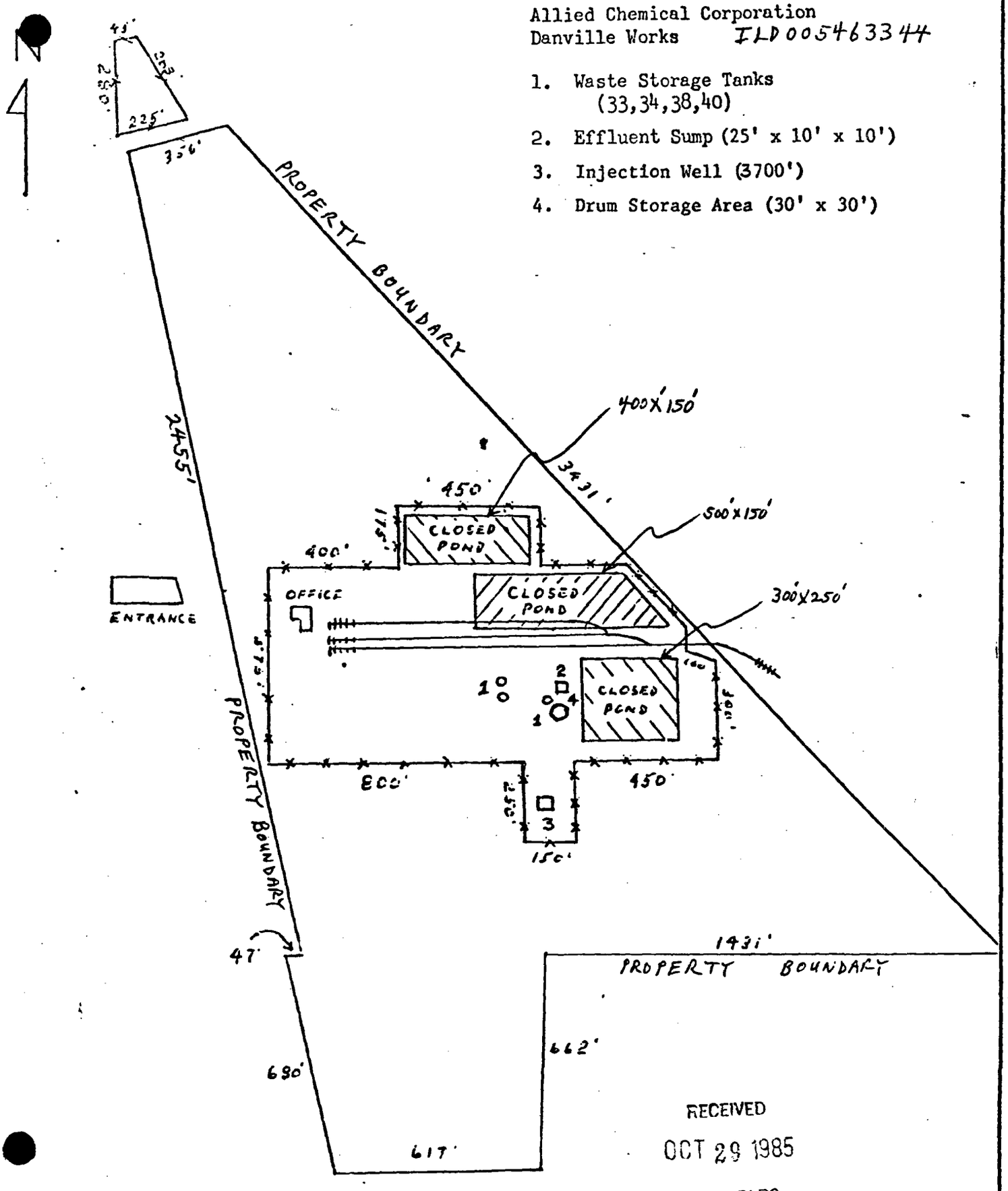
V. FACILITY DRAWING *(see page 4)*

Allied Chemical Corporation
Danville Works ILD005463344

1. Waste Storage Tanks (33,34,38,40)
2. Effluent Sump (25' x 10' x 10')
3. Injection Well (3700')
4. Drum Storage Area (30' x 30')



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SCALE APPROX. 1/4" = 100'